

Exhibit D

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

MISSOURI PRIMATE FOUNDATION, et al.,
Plaintiff,

vs. Case No.
PEOPLE FOR THE ETHICAL TREATMENT 4:16-cv-02163-CDP
OF ANIMALS, INC., et al.,
Defendant.

Videotaped Deposition of CONNIE BRAUN CASEY,
taken on behalf of the Defendant, at the offices of
Rynearson, Suess, Schnurbusch & Champion, LLC, 500
N. Broadway, Suite 1550, in the City of St. Louis,
State of Missouri, on the 29th day of October, 2018,
before Kristine A. Toennies, RMR, CRR, CRC, CCR
(MO), CSR (IL & IA), and Notary Public.

JOB No. 3027726
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1 attorney-client privilege.

2 Q (By Ms. Bernstein) Would answering my
3 question reveal any legal advice you received or
4 requested from any attorney?

5 A I'm not going to answer.

6 Q Okay. A week after your attorney sent this
7 letter -- and you can put it aside -- approximately
8 a week after that you removed more chimpanzees from
9 the facility; is that right? July 27 you removed
10 more chimpanzees. Do you recall that?

11 A I'm not sure what you're talking about more.

12 Q There were two occasions when chimpanzees
13 were transferred from the facility to the DeYoung
14 Zoo; is that right?

15 A That's correct.

16 Q The first occasion was in December of 2016,
17 and the second occasion was in -- on July 27 --

18 A Okay, correct.

19 Q -- of 2017. Do you recall that?

20 A Yes.

21 Q A week after your lawyer sent a letter
22 saying, My clients understand their duty to preserve
23 evidence?

24 A That's correct.

25 Q Who were the chimpanzees who were